IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)
a Delaware corporation; and)
QUALCOMM TECHNOLOGIES, INC.,)
a Delaware corporation,)
•) C.A. No. 24-490 (MN)
Plaintiffs,)
,)
v.)
ADMINOLDINGS DIC SALA ADMITD)
ARM HOLDINGS PLC., f/k/a ARM LTD.,	
a U.K. corporation,) REDACTED PUBLIC VERSION
D. f 1 4) KLDACTLD FODLIC VERSION
Defendant.)

PLAINTIFFS' RESPONSE TO ARM'S CONCISE STATEMENT OF FACTS IN SUPPORT OF ITS OPPOSITION TO QUALCOMM'S MOTION FOR PARTIAL SUMMARY JUDGMENT (D.I. 456)

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I. FACTS REGARDING COLLATERAL ESTOPPEL SUMMARY JUDGMENT

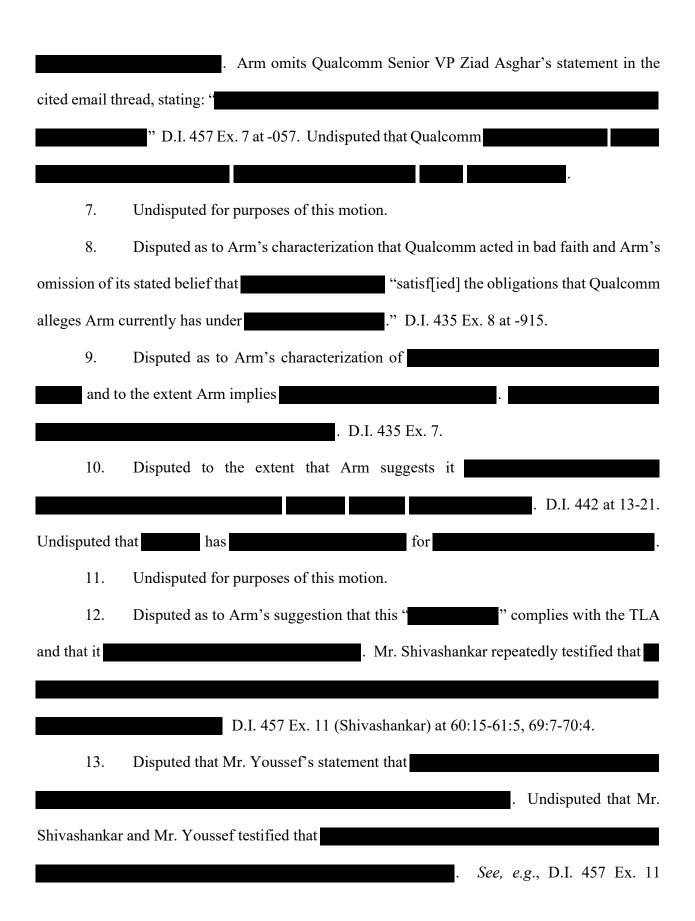
- 1. Disputed as incomplete because these facts were previously litigated in *Arm* v. *Qualcomm*. Arm's engineer compared Nuvia Confidential Information with Qualcomm Confidential Information . *See* Ex. 15 at 7-9; D.I. 444 Ex. 1. Also, no Phoenix core existed in May 2022; Phoenix is a codename for a family of Qualcomm CPUs, not a core, and Nuvia never completed a core. Ex. 23 (Golden) at 16:21-17:23.
- 2. Disputed as incomplete because these facts were previously litigated in *Arm* v. *Qualcomm*, and the Arm engineer's comparison was a violation of the Qualcomm ALA. D.I. 444 Ex. 1.
 - 3. Undisputed for purposes of this motion.

6.

II. FACTS REGARDING TLA BREACH SUMMARY JUDGMENT

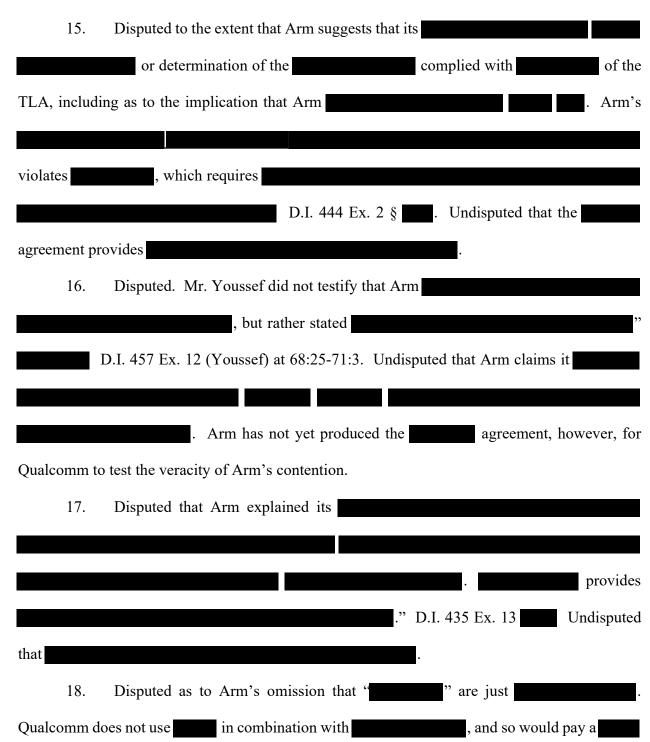
4. Disputed. Mr. Williams was asked in
D.I. 457 Ex. 6 (Williams) at 49:13-
:10. Qualcomm's Senior Director of CPU Product Management Manju Varma testified that,
D.I. 444 Ex.
(Varma) at 127:11-128:1.
5. Disputed. Arm's selective quotation misconstrues this email from one Qualcomm
aployee about one product: "
D.I. 457 Ex. 7 at -056.
nalcomm later determined
D.I. 444 Ex. 20 at -462, Ex. 21 (Cochron) at 118:5-119:12.

Disputed in part to the extent Arm suggests Qualcomm's



(Shivashankar) at 86:11-15; D.I. 442 at 7.

14. Undisputed for purposes of this motion.



under Arm's D.I. 413 Ex. 14 ¶ 115; *e.g.*, Ex. 8.

(D.I. 469-1 Ex. 60)

(see D.I. 470-1 Ex. 107).

III. FACTS REGARDING UNCLEAN HANDS SUMMARY JUDGMENT

- 20. Disputed to the extent Arm suggests Qualcomm provided confidential filings without approval. Undisputed for this motion that Qualcomm participated in private meetings.
- 21. Undisputed for purposes of this motion. Josh Sisco, the Bloomberg Article author, contacted a member of Qualcomm's communications team before publishing and said "he had heard a rumor that Qualcomm had complained to regulatory agencies, and he asked her about it. And she said that she had nothing to share with him. He called her again, again telling her he had heard such a rumor, and she said she had nothing for him on that." Ex. 13 (Chaplin) at 23:9-14. Mr. Sisco called again to say that "he was writing a story on that topic" and that "he had confirmed his story other ways." *Id.* at 23:16-18. Qualcomm's General Counsel Ann Chaplin also testified that "this story that was the subject of the topic on which—was not something we had placed but something [Qualcomm's communications team] got called about repeatedly" and that "there were not other conversations" besides hearing Mr. Sisco's overview of his story on background. *Id.* at 24:4-25:4.
- 22. Disputed. Ms. Chaplin did not "admit" that Qualcomm may be the source for other media stories disparaging Arm and its hiring practices, but rather testified that Qualcomm may speak to reporters regarding pending litigation and, separately, that certain information in an article about Arm seeking to recruit executives from its own licensees "would be consistent with a fact that I know." D.I. 457 Ex. 17 at 185:23-186:1, 201:10-204:3.
 - 23. Undisputed for purposes of this motion.

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November 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 14, 2025, upon the following in the manner indicated:

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